

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

PARKER PELHAM, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

VBIT TECHNOLOGIES CORP., VBIT
MINING LLC, ADVANCED MINING
GROUP, DANH CONG VO A/K/A DON VO,
PHUONG D VO A/K/A KATIE VO, SEAN
TU, JIN GAO, LILLIAN ZHAO, AND JOHN
DOE INDIVIDUALS 1-10, AND DOE
COMPANIES 1-10,

Defendants.

C.A. No.: 23-cv-162-JLH-SRF

CLASS ACTION

**NOTICE OF NON-OPPOSITION TO MOVANT’S MOTION FOR LEAVE
TO FILE THE FIRST AMENDED COMPLAINT**

Lead Plaintiff Alisha McKellar (“Plaintiff”) respectfully submits this Notice of Non-Opposition to her unopposed Motion for Leave to File the First Amended Complaint (the “Motion to File the Amended Complaint”). D.I. 31.

The deadline to oppose the Motion to File the Amended Complaint was July 25, 2024. No such oppositions have been filed. And as discussed in the Motion to File the Amended Complaint, no defendants oppose the motion.

Accordingly, Plaintiff respectfully requests the Court grant Plaintiff’s unopposed Motion to File the Amended Complaint in its entirety.

Dated: July 26, 2024

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

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